

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Terrance LOVE

Case: 2:20-mj-30221

Assigned To : Unassigned

Assign. Date : 6/30/2020

Case No.

Description: RE: SEALED MATTER  
(EOB)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 4, 2020 and May 23, 2020 in the county of Oakland and Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(n)

18 U.S.C. 922(a)(6)

Receipt of a firearm by a person under indictment

Making a false statement during the purchase of a firearm

This criminal complaint is based on these facts:

See attached AFFIDAVIT.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

June 30, 2020

Date: \_\_\_\_\_

City and state: Detroit, Michigan*Complainant's signature*Kara Klupacs, Special Agent (ATF)*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT**

I, Kara Klupacs, being first duly sworn, hereby state:

1. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), since March 2018, where I am responsible for investigating violations of firearms laws. I am currently assigned to the Detroit Field Division Group 4. I have graduated from the Federal Law Enforcement Training Center and the Alcohol, Tobacco, Firearms, and Explosives (ATF) Special Agent Basic Training. Prior to this, I served eight years as a Federal Law Enforcement Officer, working as a U.S. Customs and Border Protection Officer out of the Port of Detroit and as a U.S. Secret Service Uniformed Division Officer in Washington, D.C.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. The information outlined below is provided for the limited purpose of obtaining an arrest warrant. I have not set forth each and every fact I have learned in this investigation.

4. ATF is currently conducting a criminal investigation concerning Terrance LOVE (B/M; DOB: XX/XX/1995) for violations of 18 U.S.C. § 922(n) (Receipt of a Firearm by a Person Under Indictment), and 18 U.S.C. § 922(a)(6) (Making a False Statement During Purchase of a Firearm).

### **PROBABLE CAUSE**

5. On January 15, 2020, Terrance LOVE was indicted by a Grand Jury at the Raleigh County Circuit Court in West Virginia for the following felony offenses, punishable to a term of imprisonment exceeding one year: possession with intent to deliver heroin, possession with intent to deliver methamphetamine, and felony conspiracy. (Case#: 20-F-88-D). He was released on bail pending trial.

6. On February 25, 2020, Terrance LOVE received and signed “Notice to Defendant of Terms and Conditions Governing Release on Bail Prior to Trial”. Listed as a condition of release it states:

- a. **“You will not possess or use firearms or weapons of any kind. The presence of a firearm or weapon on your household will be deemed to constitute your possession of that firearm or weapon.”**

7. On March 4, 2020, LOVE purchased a Century Arms, Mini-DraCo, 7.62 caliber semiautomatic pistol bearing serial number PF-0617-2019 from the Federal Firearms Licensee (FFL) Action Impact, located at 25992 W. 8 Mile Rd.

Southfield, Michigan. Later that day, LOVE registered the firearm with the state of Michigan.

8. On March 6, 2020, I received and reviewed the Firearm Transaction Record (ATF Form 4473) completed and signed by LOVE during the purchase of the above firearm. I observed on the form that in “Section A” on question “11b” it asks, “Are you under indictment or information in any court for a felony, or any other crime for which the judge could imprison you for more than one year? LOVE marked “No.” I also observed that LOVE signed his name where it states, “I certify my answers to Section A are true, correct, and complete,” and where it further states, “I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under Federal law, and may also violate State and/or local laws.”

9. Also on March 6, 2020 I contacted the Raleigh County Court Clerk, who verified that LOVE was still under indictment. On March 9, 2020, the Raleigh County Court Clerk, also verified there were no changes to LOVE’s Terms and Conditions of release post-indictment.

10. On March 9, 2020, I contacted ATF Interstate Nexus Expert, Special Agent David Salazar, and provided a verbal description of the firearm purchased by LOVE. Based upon the verbal description, Special Agent Salazar advised the

firearm is a firearm as defined under 18 U.S.C. § 921 and was manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

11. On May 23, 2020, Detroit Police Department (DPD) responded to a residence located at 18XXX Greenlawn Street, Detroit, Michigan, for the report of a person with a weapon. Upon arrival, officers spoke with LOVE. LOVE stated he was at the location to retrieve his belongings. DPD discovered that while he was at the location, LOVE punched the victim in the right side of her mouth. LOVE was subsequently arrested for assault and battery, and transported to the Detroit Detention Center (DDC). Officers recovered a Century Arms Mini-Draco, 7.62 caliber, semiautomatic pistol bearing serial number PF-0617-2019 from the passenger side floor board of LOVE's vehicle, a black Chevy Malibu bearing license plate DPF8973. This is the same firearm that he purchased at Action Impact on March 4, 2020.

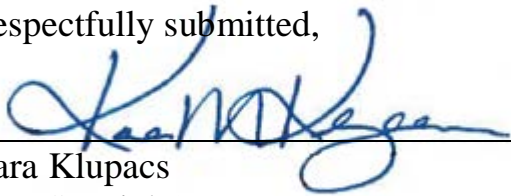
12. On May 24, 2020, LOVE was released from DPD custody. On May 29, 2020, DPD returned the seized Century Arms Mini-Draco to LOVE.

13. On June 22, 2020, I contacted the Raleigh County Court Clerk, who verified that LOVE was still under indictment. The clerk also verified there were no changes reported to his file and no changes to LOVE's Terms and Conditions of release post-indictment.


**CONCLUSION**

14. Based upon the aforementioned facts, there is probable cause to believe that Terrance LOVE (B/M; DOB: XX/XX/1995), a person under indictment for a crime punishable by a term exceeding one year, did knowingly and intentionally possess one Century Arms, Mini-Draco, 7.62 caliber semiautomatic pistol bearing serial number PF-0617-2019, a firearm having previously traveled in or affected interstate commerce, in violation of 18 U.S.C. § 922(n) (Receipt of a Firearm by a Person Under Indictment), and did make a false statement to a FFL to obtain a firearm, in violation of 18 U.S.C. § 922(a)(6) (Making a False Statement During Purchase of a Firearm). Said violations occurred within the Eastern District of Michigan.

Respectfully submitted,

  
\_\_\_\_\_  
Kara Klupacs  
ATF Special Agent

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

  
\_\_\_\_\_  
Hon. David R. Grand  
United States Magistrate Judge

Dated: June 30, 2020